



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

DEVAL L. PATRICK
Governor

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Secretary

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Commissioner

December 16, 2014

Ms. Lynn Mastera
Acushnet Rubber Company, Inc. dba
Precix
744 Belleville Ave.
New Bedford, MA, 02745

RE: New Bedford
Transmittal No.: X262314
Application No.: SE-14-026
Class: SM79-7
FMF No.: 130033
AIR QUALITY PLAN APPROVAL

Dear Ms. Lynn Mastera

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed your Non-major Comprehensive Plan Application (“Application”) listed above. This Application concerns the proposed construction, alteration and operation of your rubber products facility located at 744 Belleville Ave. in New Bedford, Massachusetts (“Facility”). The Application bears the seal and signature of Mr. Thomas Couture, Massachusetts Registered Professional Engineer Number 27553.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-N, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Precix operates two distinct operations at the existing facility:

Ecast (Urethane) – the production of urethane seals and o-rings used in high pressure pumps. Urethane polymer is heated and dispensed into small containers, which are heated on a steam table, after which the cans are moved to the mixing area where a curing agent is added. The urethane is poured into molds then cured in a steam curing press, followed by a post curing oven. The mold release agents contain no volatile organic compounds or HAPs. The paddles used in the mixing area are cleaned with a solvent based cleaner. As part of this plan application, Precix has proposed increasing urethane production as well as paddle cleaner usage.

Rubber products – Precix has proposed modification of an existing curing oven and the installation of five new curing ovens. The new equipment debottlenecks existing process equipment, which were previously exempt from plan approval since the existing equipment was installed prior to the implementation of the Clean Air Act. Limitations for the debottlenecked equipment are established herein.

Precix has proposed the installation of two new APC Model 502 Ultra High Efficiency Filter (UHF) System units to replace the existing electrostatic precipitator, which is used to control particulate matter (PM) from the rubber post curing ovens. The UHF, which has a control efficiency of 99% is exempt from plan approval in accordance with the Regulations at 310 CMR 7.02 (2)(b)2 Air Pollution Control Equipment for Control of Particulate.

Precix installed a new 24 MMBtu per hour gas fired boiler, which conforms to the Industry Performance Standards at 310 CMR 7.26(30) through (37). The new boiler replaced an existing boiler, which fired No. 6 fuel oil.

Federally enforceable emission limitations of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) for production activities are established herein. Precix has determined that emissions of Particulate Matter (PM) from production activities are 0.94 tons per year, post control, and in accordance with MassDEP Regulations at 310 CMR 7.02(2)(b)7 are exempt from Plan Approval as a de-minimis Increase in Emissions.

With the installation of the new boiler, in conjunction with the federally enforceable emission limits established herein, Precix no longer has potential emissions for criteria pollutants that exceed the thresholds for a Major Facility as defined in 310 CMR 7.00, Appendix C. Accordingly, the 50% Facility Emission Cap, approved by MassDEP on January 28, 2009 is no longer necessary and is hereby rescinded.

2. EMISSION UNIT IDENTIFICATION

Each Emission Unit ("EU") identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU	Description	Design Capacity	Pollution Control Device (PCD)
4	Banbury	5,000 lbs rubber per hour	Baghouse
13	Rubber Mix Cleaner	Not Applicable	none
14	Mill Mixing	230 lbs rubber per hour	
16	Mill Mixing		
20	Rubber Post Curing Ovens 9 existing batch ovens 1 existing rotary oven 5 new rotary ovens	1,105 lbs rubber per hour	APC Model 502 Ultra High Efficiency filter
18	18 small curing ovens – lab use	125 lbs rubber per hour	none
21	PMR Spray booth	1.07 gallons per hour	paper filter
35	Rubber Presses	830 lbs rubber per hour	none
41	Color Tilt Mixer	1,000 lbs rubber per hour	Baghouse
42	Ecast	55 lbs urethane per hour	none
44	Paddle cleaner	Not Applicable	none
43	Black Tilt Mixer	855 lbs rubber per hour	Baghouse

Table 1 Key:

EU = Emission Unit Number

PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit
4	1. ≤ 50,000 pounds of	HAPs (Total & individual)	≤ 0.004 TPM ≤ 0.04 TPY

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit
	rubber per month 2. $\leq 500,000$ pounds of rubber per year	VOC	≤ 0.01 TPM ≤ 0.11 TPY
13	3. ≤ 5 gal/month 4. ≤ 55 gal/yr	VOC	≤ 6.84 lbs VOC/gal ≤ 0.02 TPM ≤ 0.19 TPY
14	5. $\leq 2,000$ pounds of rubber per month 6. $\leq 20,000$ pounds of rubber per year	HAPs (Total & individual)	≤ 0.01 TPM ≤ 0.01 TPY
		VOC	≤ 0.01 TPM ≤ 0.01 TPY
20	7. $\leq 301,600$ pounds of rubber per month 8. $\leq 3,016,000$ pounds of rubber per year	HAPs (Total & individual)	≤ 0.01 TPM ≤ 0.01 TPY
		VOC	≤ 0.91 TPM ≤ 9.06 TPY
18	9. Record keeping	HAPs (Total & individual)	≤ 0.01 TPM ≤ 0.01 TPY
		VOC	≤ 0.01 TPM ≤ 0.01 TPY
21	10. ≤ 100 gal/month 11. $\leq 1,000$ gal/yr	VOC	7.45 lb VOC/gal ≤ 0.37 TPM ≤ 3.72 TPY
35	12. $\leq 377,000$ pounds of rubber per month 13. $\leq 3,770,000$ pounds of rubber per year	HAPs (Total & individual)	≤ 0.19 TPM ≤ 1.91 TPY
		VOC	≤ 1.26 TPM ≤ 12.6 TPY
41	14. $\leq 75,000$ pounds of rubber per month 15. $\leq 750,000$ pounds of rubber per year	HAPs (Total & individual)	≤ 0.003 TPM ≤ 0.03 TPY
		VOC	≤ 0.003 TPM ≤ 0.03 TPY
42	16. $\leq 80,000$ pounds of polymer per month 17. $\leq 350,000$ pounds of polymer per year	HAPs (Total & individual)	≤ 2.06 TPM ≤ 9.01 TPY
		VOC	≤ 2.06 TPM ≤ 9.01 TPY
44	18. 100 gal/month 19. 400 gal/yr	VOC	≤ 0.46 TPM ≤ 1.82 TPY
43	20. $\leq 150,000$ pounds of rubber per month 21. $\leq 1,500,000$ pounds of rubber per year	HAPs (Total & individual)	≤ 0.003 TPM ≤ 0.03 TPY
		VOC	≤ 0.01 TPM ≤ 0.06 TPY

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit
Facility-wide		HAPs (maximum individual)	≤ 9.01 TPY
		HAPs (total)	≤ 12.02 TPY
		VOC	≤ 38.46 TPY

Table 2 Key:

EU = Emission Unit Number

HAP (total) = total Hazardous Air Pollutants.

HAP (single) = maximum single Hazardous Air Pollutant

TPY = tons per consecutive 12-month period

gal / month = gallons per month

VOC = Volatile Organic Compounds

TPM = tons per month

gal/yr = gallons per consecutive 12-month period

lbs VOC/gal = pounds VOC per gallon

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

Table 3	
EU	Monitoring and Testing Requirements
Facility-wide	1. The Permittee shall monitor operations of each emission unit to verify compliance with the operational limitations contained in Table 2 above.
	2. The Permittee shall monitor operations of each emission unit to verify compliance with the emission limitations contained in Table 2 above.
	3. The Permittee shall monitor all maintenance related activities that may affect air contaminant emission rates.
	4. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	5. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.
	6. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.
	7. Within 45 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.

Table 3 Key:

EU = Emission Unit Number
MassDEP = Massachusetts Department of
Environmental Protection

CMR = Code of Massachusetts Regulations
USEPA = United States Environmental Protection
Agency

Table 4	
EU	Record Keeping Requirements
Facility-wide	1. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping .
	2. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	6. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	7. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	8. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU = Emission Unit Number
SOMP = Standard Operating and Maintenance
Procedure
CMR = Code of Massachusetts Regulations

PCD = Pollution Control Device
USEPA = United States Environmental Protection
Agency
MassDEP = Massachusetts Department of
Environmental Protection

Table 5	
EU	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Southeast Regional Office of MassDEP, BWP Compliance & Enforcement Chief by telephone: 508-946-2878, email: sero.Air@massmail.state.ma.us, or fax :508-947-6557, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Compliance & Enforcement Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.

Table 5 Key:

EU = Emission Unit Number
MassDEP = Massachusetts Department of
Environmental Protection

CMR = Code of Massachusetts Regulations
BWP = Bureau of Waste Prevention

4. SPECIAL TERMS AND CONDITIONS

- A. The Permittee is subject to, and shall comply with, the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU	Special Terms and Conditions
Facility-wide	<p>1. This Plan Approval, Transmittal No. X262314, supersedes the following Approvals</p> <ul style="list-style-type: none"> a. Plan Approval 4P08070, transmittal No. X225883, dated January 28, 2009. b. Plan Approval 4P11014, transmittal No. X237414, dated May 12, 2011, c. Plan Approval 4B09041, transmittal No. X231071, dated January 20, 2010, d. Restricted Emission Status Approval 4R95004, dated June 22, 1995, e. 50% Facility Emission Cap Approval dated January 28, 2009. <p>The listed Approvals shall be deemed null and void</p>

Table 6 Key:

EU = Emission Unit Number

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including, but not limited to, rain protection devices known as “shanty caps” and “egg beaters.”
- C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
4	45	2	250	70-80
13	Fugitive Emissions			
14	18 (2 total)	1.2	10	70-80
20	30 (2 total)	1.33	48	80-100
18	15	0.7	10	50-900
21	40	1.2	10	70-420
35	Fugitive Emissions			
41	Fugitive Emissions			
43	Fugitive Emissions			

Table 7 Key:

EU = Emission Unit Number

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Acushnet Rubber Company, Inc. dba Precix
December 16, 2014 - Plan Approval
Transmittal No. X262314
Application No. SE-14-026
Page 11 of 11

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact the undersigned by telephone at 508-946-2824 or in writing at the letterhead address.

*This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.*

Thomas Cushing
Permit Chief
Bureau of Waste Prevention

Enclosure

ecc: New Bedford Health Dept
New Bedford Fire Dept
MassDEP/SERO – M. Pinaud
L. Black
MassDEP/Boston - Yi Tian
Tighe & Bond D. Stellato